



23490 Connecticut Street  
Hayward, California 94545  
510.773-9137-510.782-8584 Fax

October 22, 2004

Mr. William J. Gaffney  
NAPA SANITATION DISTRICT  
935 Hartle Court  
Napa, CA 94559

**Re: August 2004 Compliance Monitoring Results for the Jefferson Car Wash Site  
Groundwater Extraction and Treatment System, 3080 Jefferson Street,  
Napa, California, Industrial User Permit No. 495950.**

Dear Mr. Gaffney:

This letter presents the results of August 2004 Compliance Monitoring for the Groundwater Extraction and Treatment System (System) at the Jefferson Car Wash site, 3080 Jefferson Street, Napa, California. Compliance monitoring and reporting have been conducted in accordance with the guidelines stipulated in the Industrial User Permit No. 495950. Presented herein are the results of the 5<sup>th</sup> compliance monitoring event after System start-up, which occurred on March 29, 2004.

The compliance monitoring activities for this reporting period were performed by Decon Environmental Services, the operations and maintenance (O&M) contractor for the System, under the direction of Malcolm Pirnie on September 1, 2004. The monitoring activities included:

1. Sampling the System effluent.
2. Recording the total volume of raw water discharged from individual extraction wells (EW-2 and EW-3).
3. Recording the total volume of treated water discharged to sanitary sewer.

Per Permit requirements, effluent samples were analyzed for total petroleum hydrocarbons as diesel (TPH-D) by United States Environmental Protection Agency (USEPA) Method 8015M, TPH as gasoline (TPH-G), benzene, toluene, ethylene, total xylenes (BTEX), and methyl-tertiary-butyl ether (MTBE) by USEPA Method 8260B, and total lead by USEPA Method 200.7.

Table 1 presents the analytical results for the System effluent and the System flow parameters. The analytical laboratory report is attached.

The analytical laboratory reported the concentrations of constituents of concern to be non-detect in the System effluent.

During this period, inadvertent System power shut-downs occurred because of problems with PG&E and subsequent vandalism on System panel. During this reporting period, the System was in operation for no more than 15 days. After these issues were resolved, the System was returned to full normal operation.

The average daily discharge rate for this reporting period was estimated to be 0.35 gallons per minute (gpm), which was below the 8 gpm limit. A total of 7,540 gallons of treated water was discharged to the sanitary sewer during this reporting period. The total treated water discharged to the sanitary sewer was approximately 3% of the average monthly discharge reported for the previous months of operation.

Please contact Jason at (510) 732-6444 Ext. 17 or Todd Miller with Malcolm Pirnie at (510) 735-3014 to discuss any comments or questions.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that a qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

**DECON ENVIRONMENTAL SERVICES**



Jason Gulbransen

Mr. William J. Gaffney  
NAPA SANITATION DISTRICT

October 22, 2004  
Page 3

Project Manager

Attachments: Table 1, Analytical Laboratory Report

c: George Altamura, Altamura Enterprises  
Joel Coffman, Napa County  
Todd Miller, Malcolm Pirnie  
File (4459-008)  
P:\4459\008\GWTS Compliance Monitoring\July 2004 Compliance Monitoring Letter Report.doc

**Table 1: Compliance Monitoring Results, August 2004**  
**Interim Groundwater Extraction and Treatment System**  
**Jefferson Car Wash Site**  
*Industrial User Permit No: 495950*

Parameter	Units	USEPA Method	Date Collected	System Effluent	Permitted Reporting Limit <sup>1</sup>
<b>Volatile Organic Compounds</b>					
Methyl Tertiary-Butyl Ether	µg/L <sup>6</sup>	8260B	9/1/2004	< 1	1.0% LEL <sup>4</sup>
Benzene	µg/L	8260B	9/1/2004	< 0.5	1.0% LEL
Toluene	µg/L	8260B	9/1/2004	< 0.5	1.0% LEL
Ethylbenzene	µg/L	8260B	9/1/2004	< 0.5	1.0% LEL
Xylenes, Total	µg/L	8260B	9/1/2004	< 1	1.0% LEL
TPH as Gasoline	µg/L	8260B	9/1/2004	< 25	-- <sup>5</sup>
TPH as Diesel	µg/L	8015M	9/1/2004	< 50	--
Total Lead	mg/L <sup>7</sup>	200.7	9/1/2004	< 0.01	0.14
<b>Operational</b>					
Total Volume Discharged to Sanitary Sewer <sup>2</sup>	gallons	--	9/1/2004	7,540	--
Daily Average System Flow Rate <sup>3</sup>	gpm <sup>8</sup>	--	9/1/2004	0.35	8

**Notes:**

<sup>1</sup> As stated in Industrial User Permit, No: 495950, issued for the System on 03/02/2004.

<sup>2</sup> The sum of volumes extracted from individual wells, EW-2 and EW-3, for this period as recorded by the flow totalizer at the respective well-head.

i.e., { Sum of Flow Totalizer Volume at EW-2 and EW-3 for this period } -

{ Sum of Flow Totalizer Volume at EW-2 and EW-3 for the previous period }

<sup>3</sup> Calculated as the Total Volume Discharged to Sanitary Sewer divided by the number of days the system was in operation during the reporting period. The system discharge was approximately 3% of the monthly discharge recorded during the previous months of operation. This low discharge volume was caused by inadvertent power shut-downs due to problems with PG&E and subsequent vandalism on System panel. Based on information provided by the O&M Contractor, it is estimated the System was in operation for no more than 15 days during this period.

<sup>4</sup> Lower explosive limit.

<sup>5</sup> No reporting limit stated or not applicable.

<sup>6</sup> Micrograms per liter.

<sup>7</sup> Milligrams per liter.

<sup>8</sup> Gallons per minute.

# Entech Analytical Labs, Inc.

3334 Victor Court • Santa Clara, CA 95054 • (408) 588-0200 • Fax (408) 588-0201

Jason Gulbransen

Decon Environmental Services, Inc.

23490 Connecticut Street

Hayward, CA 94545

Certificate ID: 40288 - 9/8/2004 5:46:56 PM

**Order:** 40288

**Project Name:** Jefferson Carwash

**Project Number:** 4470

**Date Collected:** 9/1/2004

**Date Received:** 9/3/2004

**P.O. Number:** 4470

## Certificate of Analysis - Final Report

On September 03, 2004, sample was received under chain of custody for analysis. Entech analyzes samples "as received" unless otherwise noted. The following results are included:

<u>Matrix</u>	<u>Test</u>	<u>Method</u>	<u>Comments</u>
Liquid	8260Petroleum	EPA 8260B	
	TPH as Gasoline - GC/MS	GC-MS	

Entech Analytical Labs, Inc. is certified for environmental analyses by the State of California (#2346).  
If you have any questions regarding this report, please call us at 408-588-0200 ext. 225.

Sincerely,



Laurie Glantz-Murphy  
Laboratory Director

# Entech Analytical Labs, Inc.

3334 Victor Court , Santa Clara, CA 95054

Phone: (408) 588-0200

Fax: (408) 588-0201

Decon Environmental Services, Inc.  
23490 Connecticut Street  
Hayward, CA 94545  
Attn: Jason Gulbransen

Project Number: 4470  
Project Name: Jefferson Carwash  
Date Received: 9/3/2004  
P.O. Number: 4470  
Sampled By: Client

## Certificate of Analysis - Data Report

Lab # : 40288-001 Sample ID: Discharge Point

Matrix: Liquid Sample Date: 9/1/2004 7:30 AM

Method: EPA 8260B / EPA 5030B / Purge-and-trap

Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
Benzene	ND		1	0.5	µg/L	N/A	N/A	09/07/2004	WMS1040907
Toluene	ND		1	0.5	µg/L	N/A	N/A	09/07/2004	WMS1040907
Ethyl Benzene	ND		1	0.5	µg/L	N/A	N/A	09/07/2004	WMS1040907
Xylenes, Total	ND		1	1	µg/L	N/A	N/A	09/07/2004	WMS1040907
Methyl-t-butyl Ether	ND		1	1	µg/L	N/A	N/A	09/07/2004	WMS1040907

Surrogate	Surrogate Recovery	Control Limits (%)	
4-Bromofluorobenzene	92.9	64	- 125
Dibromofluoromethane	106.0	23	- 172
Toluene-d8	99.5	70	- 134

Analyzed by: Xbian

Reviewed by: MTU

Method: GC-MS

Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
TPH as Gasoline	ND		1	25	µg/L	N/A	N/A	09/07/2004	WMS1040907

Surrogate	Surrogate Recovery	Control Limits (%)	
4-Bromofluorobenzene	110.0	64	- 125
Dibromofluoromethane	99.9	23	- 172
Toluene-d8	107.0	70	- 134

Analyzed by: Xbian

Reviewed by: MTU

# Entech Analytical Labs, Inc.

3334 Victor Court , Santa Clara, CA 95054

Phone: (408) 588-0200

Fax: (408) 588-0201

## Quality Control - Method Blank

### Liquid

Validated by: MTU - 09/08/04

QC Batch ID: WMS1040907

Analysis Date: 9/7/2004

#### Method Blank

##### Method: EPA 8260B

Parameter	Result	DF	PQL	PQLR	Units
Benzene	ND	1	0.5	0.5	µg/L
Ethyl Benzene	ND	1	0.5	0.5	µg/L
Methyl-t-butyl Ether	ND	1	1	1	µg/L
Toluene	ND	1	0.5	0.5	µg/L
Xylene, m+p	ND	1	1	1	µg/L
Xylene, o	ND	1	0.5	0.5	µg/L
Xylenes, Total	ND	1	1	1	µg/L

Surrogate for Blank	% Recovery	Control Limits
4-Bromofluorobenzene	91.0	64 - 125
Dibromofluoromethane	103.0	23 - 172
Toluene-d8	101.0	70 - 134

## Quality Control - Laboratory Control Spike / Duplicate Results

### Liquid

Reviewed by: MTU - 09/08/04

QC Batch ID: WMS1040907

Analysis Date: 9/7/2004

#### LCS Method: EPA 8260B

Parameter							Conc. Units: µg/L		
	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
1,1-Dichloroethene	<0.5	20.0	17.3	LCS	9/7/2004	87			60 - 132
Benzene	<0.5	20.0	20.7	LCS	9/7/2004	100			77 - 154
Chlorobenzene	<0.5	20.0	20.5	LCS	9/7/2004	100			66 - 141
Methyl-t-butyl Ether	<1	20.0	18.7	LCS	9/7/2004	94			58 - 127
Toluene	<0.5	20.0	19.2	LCS	9/7/2004	96			47 - 137
Trichloroethene	<0.5	20.0	19.9	LCS	9/7/2004	100			57 - 159

Surrogate	% Recovery	Control Limits
4-Bromofluorobenzene	93.4	64 - 125
Dibromofluoromethane	99.3	23 - 172
Toluene-d8	97.2	70 - 134

#### LCSD Method: EPA 8260B

Parameter							Conc. Units: µg/L		
	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
1,1-Dichloroethene	<0.5	20.0	18.4	LCSD	9/7/2004	92	6.2	25	60 - 132
Benzene	<0.5	20.0	22.9	LCSD	9/7/2004	110	10.1	25	77 - 154
Chlorobenzene	<0.5	20.0	22.2	LCSD	9/7/2004	110	8.0	25	66 - 141
Methyl-t-butyl Ether	<1	20.0	20.6	LCSD	9/7/2004	100	9.7	25	58 - 127
Toluene	<0.5	20.0	20.9	LCSD	9/7/2004	100	8.5	25	47 - 137
Trichloroethene	<0.5	20.0	21.8	LCSD	9/7/2004	110	9.1	25	57 - 159

Surrogate	% Recovery	Control Limits
4-Bromofluorobenzene	89.5	64 - 125
Dibromofluoromethane	101.0	23 - 172
Toluene-d8	96.3	70 - 134

# Entech Analytical Labs, Inc.

3334 Victor Court , Santa Clara, CA 95054

Phone: (408) 588-0200

Fax: (408) 588-0201

## Quality Control - Method Blank

### Liquid

Validated by: MTU - 09/08/04

QC Batch ID: WMS1040907

Analysis Date: 9/7/2004

#### Method Blank

##### Method: GC-MS

Parameter	Result	DF	PQL	PQLR	Units
TPH as Gasoline	ND	1	25	25	µg/L

Surrogate for Blank	% Recovery	Control Limits
4-Bromofluorobenzene	107.0	64 - 125
Dibromofluoromethane	96.6	23 - 172
Toluene-d8	108.0	70 - 134

## Quality Control - Laboratory Control Spike / Duplicate Results

### Liquid

Reviewed by: MTU - 09/08/04

QC Batch ID: WMS1040907

Analysis Date: 9/7/2004

#### LCS Method: GC-MS

Parameter	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	Conc. Units: µg/L	RPD	RPD Limits	Recovery Limits
TPH as Gasoline	<25	125	142	LCS	9/7/2004	110				65 - 135

Surrogate	% Recovery	Control Limits
4-Bromofluorobenzene	110.0	64 - 125
Dibromofluoromethane	95.3	23 - 172
Toluene-d8	109.0	70 - 134

#### LCSD Method: GC-MS

Parameter	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	Conc. Units: µg/L	RPD	RPD Limits	Recovery Limits
TPH as Gasoline	<25	250	138	LCSD	9/7/2004	110		3.4	25	65 - 135

Surrogate	% Recovery	Control Limits
4-Bromofluorobenzene	108.0	64 - 125
Dibromofluoromethane	95.2	23 - 172
Toluene-d8	111.0	70 - 134



# Entech Analytical Labs, Inc.

3334 Victor Court  
Santa Clara, CA 95054  
(408) 588-0201 - Fax

# Chain of Custody / Analysis Request

<b>Attention to:</b> J. Gullerensen Company Name: DEION ENV. Sols. Inc. Mailing Address: 23450 Connecticut St City: Hayward CA 94545 State: CA Zip: 94545 Project Location: NARA, A Treatment System		<b>Phone No.:</b> 56773 9137 <b>Fax No.:</b> 782 8584 56773 6444 <b>email:</b>		<b>Purchase Order No (Reqd.):</b> 4470 <b>Project Number:</b> 4470 <b>Project Name:</b> Jefferson Car Wash <b>City:</b>		<b>Send Invoice to (if Different):</b> Company: Billing Address (if Different): State: Zip:		<b>Phone</b>	
<b>Order ID:</b>		<b>Sampling</b> Turn Around Time <input type="checkbox"/> Same Day <input type="checkbox"/> 1 Day <input type="checkbox"/> 2 Day <input type="checkbox"/> 3 Day <input type="checkbox"/> 4 Day <input checked="" type="checkbox"/> 5 Day <input checked="" type="checkbox"/> Standard (10 Day)		<b>Containers</b> Composite: Matrix: Grab:		<b>Preservative</b> Volatile Organics by GC/MS: 624 Fuel Oxygenates by GC/MS: 8010 by 8260 MTBE by 8260 PCBs - 8082 BTEX, mTOL by 8260 TPH as Gas by GC/MS Base/Neutr/Acid Organics 8270 Fuel Scan 8270-SIM Diesel Extracable Motor Oil w/ Sigel Column Cleanup PNA Purgeable CN TRPH Oil & Grease Metals - Circle Below STLC TTLC		<b>Remarks</b>	
<b>Client ID:</b> DISC 44662 DEION		<b>Date:</b> 9-1-04		<b>Time:</b> 0730		NO BOLTS RECEIVED FOR FATH-D. CLIENT NOTIFIED 9-3-04		(X)	
<b>Relinquished by:</b> J. Gullerensen		<b>Received by:</b> [Signature]		<b>Date:</b> 9/3/04		<b>Time:</b> 12:15 PM		<b>Special Instructions or Comments</b>	
<b>Relinquished by:</b> [Signature]		<b>Received by:</b> [Signature]		<b>Date:</b> 9/3/04		<b>Time:</b> 4:00		NPDES Detection Limits <input type="checkbox"/> EDD Report Required <input type="checkbox"/> EDF Report Required <input type="checkbox"/> PDF File Required	
<b>Relinquished by:</b> [Signature]		<b>Received by:</b> [Signature]		<b>Date:</b> [Blank]		<b>Time:</b> [Blank]		Metals: Al, As, Sb, Ba, Be, B, Cd, Ca, Cr, Co, Cu, Fe, [Pb] Mg, Mn, Hg, Mo, Ni, K, Si, Ag, Na, Se, Sr, Ti, Sn, Tl, V, Zn, W : RCRA-8 CAM-17 Plating CAM-13 LUFT-5	